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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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PHILOMENA CINDY RINALDI,

Plaintiff,

-against-

CV 12-141 (PKC) (ARL)

QUALITY KING DISTRIBUTORS
INCORPORATED,

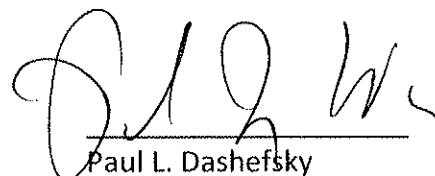
**NOTICE OF MOTION FOR SUMMARY
JUDGMENT PURSUANT TO FRCP 56**

Defendant.

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PLEASE TAKE NOTICE that upon the annexed Affirmation of Paul L. Dashefsky, dated July 30, 2013, the exhibits annexed thereto, the annexed Rule 56.1 Counter-Statement of Material facts, the accompanying Memorandum of Law, , and all the prior proceedings heretofore had herein, the Plaintiff, Philomena Cindy Rinaldi, will move this Court at the United States Eastern District of New York Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on a date a time to be determined by the Court, for an Order pursuant to Rule 56 of the federal Rules of Civil Procedure, granting summary judgment in favor of the Plaintiff ordering reinstatement with full back pay and other benefits of employment, together with monetary damages to be determined at a hearing, costs, attorney's fees, and such other and further relief as this Court deems just and proper.

Dated: July 30, 2013
Smithtown, N.Y.


Paul L. Dashefsky